West Virginia Department of Environmental Protection Division of Air Quality

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on February 4, 2013.

Permit Number: **R30-00700006-2013**Application Received: **May 26, 2015**Plant Identification Number: **03-54-007-00006**

Permittee: Equitrans, L.P.

Facility Name: Burnsville #71 Compressor Station Mailing Address: P.O. Box 191, Burnsville, WV 26335

Permit Action Number: MM01 Revised: January 30, 2017

Physical Location: Burnsville, Braxton County, West Virginia

UTM Coordinates: 529.40 km Easting • 4301.40 km Northing • Zone 17

Directions: From Charleston, take Interstate 79 North to the Burnsville Exit. Go to

the Exxon station and turn left. Turn left at the next intersection. Stay on this road, as it passes the grade school and goes under the interstate.

Facility Description

The Burnsville Compressor Station #71 is a natural gas production and transmission facility covered by NAICS 486210 and SIC 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 600-hp natural gas internal combustion reciprocating engine, two (2) 1350-hp natural gas internal combustion reciprocating engines, one (1) heating boiler, one (1) dehydration boiler, one (1) TEG dehydrator, one (1) dehydration flare, one (1) 251-hp natural gas fired electric generator, and six (6) tanks of various capacities.

This modification incorporates the requirements approved under R13-3252 to replace the flare tip on the existing flare with a John Zink EEF-500 flare pilot to meet the design criteria specified in 40CFR§60.18(b).

Emissions Summary

There are no changes in emissions associated with the proposed permit.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 151.21 TPY of Carbon Monoxide and 327.01 TPY of Nitrogen Oxides. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Equitrans, L.P. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6 45CSR10	Open burning prohibited. To Prevent and Control Air Pollution from the Emission of Sulfur Oxides
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary sources
	45CSR30	Operating permit requirement.
State Only:	None	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (if any)
R13-3252	August 8, 2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

As a result of the changes made under R13-3252, the following changes were made to this Title V permit:

- Citation was updated in condition 3.4.1.
- Old requirements 5.1.1, 5.1.2 and 5.1.3 were replaced with new requirements (underlying R13 requirements 4.1.1, 4.1.2 and 4.1.3).
- Condition 5.1.4 was updated and old requirements 5.1.5, 5.1.6, 5.1.7, 5.1.8 and 5.1.10 were removed.
- New condition 5.1.9 was added to incorporate requirement 4.1.4 of R13-3252 and section 5.1 was renumbered.
- Old requirements 5.2.2 and 5.2.3 were replaced with new requirements (underlying R13 requirements 4.2.4 and 4.2.5) and old requirement 5.2.4 was removed.
- New condition 5.2.10 was added to incorporate requirement 4.2.1 of R13-3252 and section 5.2 was renumbered.
- Old requirements 5.3.1 and 5.3.3 were replaced with new requirements (underlying R13 requirements 4.2.3 and 4.3.1) and old requirement 5.3.2 was deleted.
- New condition 5.3.5 was added to incorporate requirement 4.2.2 of R13-3252.
- Old requirement 5.3.4 was updated and section 5.3 was renumbered.
- Old requirements 5.4.2, 5.4.3, 5.4.4, 5.4.5 and 5.4.7 were removed and old requirement 5.4.9 was updated.
- New conditions 5.4.5 and 5.4.6 were added to incorporate requirements 4.4.2 and 4.4.4 of R13-3252 and section 5.4 was renumbered.
- Old requirements 5.5.2, 5.5.3 and 5.5.4 were removed and new condition 5.5.4 was added to incorporate requirement 4.5.1 of R13-3252.
- Condition 5.5.1 was updated and section 5.5 was renumbered.
- Emission Unit Table was updated for the existing flare to replace the flare tip with a John Zink EEF-500. The replacement flare is subject to Rules 6 & 10 (WV State Rules on PM and SO₂).
 - 45 CSR §6-4.1. establishes an allowable PM emission limit from this flare at 0.62 pounds per hour. This allowable is based on a mass rate of 230 pounds of effluent per hour being routed to the flare. The effluent to this flare is in a gaseous state and should not cause the PM emissions to increase beyond this allowable, with the predicted potential being at 0.01 pounds of PM per hour. Since the 0.01lb/hr PM limit in condition 5.1.2.e is less stringent than the 45 CSR §6-4.1 hourly PM limit, these limits were streamlined. 45 CSR §6-4.3 limits visible emission from incinerators to less than 20% opacity. A visible indicator of proper operation of a flare is no visible emissions (zero opacity). EQT plans on operating this particular flare in such a manner per condition 5.1.2.g.i.
 - 45 CSR §10-5.1 establishes a hydrogen sulfide (H₂S) limit on the combustion of process gas streams to 50 grains of H₂S per 100 cubic feet of carrier gas. EQT's Burnsville Station receives field gas which may contain hydrogen sulfide. The field gas received by the BCS typically has concentration levels of hydrogen sulfide less than 1 ppm. To demonstrate compliance with this limit the permittee will conduct gas sampling per condition 5.3.5.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- 40 CFR Part 60- The proposed modification includes modifying the elevated flare tip in order to comply with the required design criteria outlined in 40 CFR§60.18(b). This revision does not meet the definition of a modification per§60.14(a), and is not subject to NSPS regulations.
- 40 CFR Part 64-Compliance Assurance Monitoring (CAM) Plan –There are no proposed changes to the DEHY unit that affects CAM applicability. The DEHY unit remains subject to the CAM requirements included in the Title V permit.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.

Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Beena Modi West Virginia Department of Environmental Protection Division of Air Quality 601 57th Street SE Charleston, WV 25304

Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.